

**IN THE CIRCUIT COURT OF ST. LOUIS CITY
TWENTY-SECOND JUDICIAL CIRCUIT
STATE OF MISSOURI**

MARCIA CLARK,)	
)	
Plaintiff,)	Cause No.: 1822-CC00869
v.)	
)	Division No.: 1
BALLPARK VILLAGE HOLDINGS)	
BLOCK 600, LLC, d/b/a PBR ST. LOUIS:)	
A COWBOY BAR)	
)	
And)	
)	
JOHN DOE,)	
)	
Defendants.)	

**MOTION FOR LEAVE TO FILE SECOND AMENDED PETITION BY
INTERLINEATION**

COMES NOW Plaintiff Marcia Clark, by and through her lawyer, and for her Motion for Leave to File Second Amended Petition by Interlineation, states as follows:

1. This motion is made pursuant to Mo. R. Civ. Pro. 55.33(a), which indicates that "...the pleading may be amended only by leave of court or by written consent of the adverse party; and leave shall be freely given when justice so requires."
2. In the alternative, Plaintiff offers her motion pursuant to Mo. R. Civ. Pro. 55.33(d), which permits "...service of a supplemental pleading setting forth transactions or occurrences or events that have happened since the date of the pleading sought to be supplemented."
3. Plaintiff served a summons and copy of the petition on SL Western Lounge, LLC St. Louis: A Cowboy Bar on May 9, 2018.
4. Counsel for Defendant has indicated that the correct legal entity in this suit is SL Western Lounge, LLC (See Email from Opposing Counsel, Attached as Exhibit A).

5. Plaintiff has drafted her Second Amended Petition replacing every instance of Ballpark Village Holdings, Block 600 LLC St. Louis: A Cowboy Bar with SL Western Lounge, LLC (See Second Amended Petition, Attached as Exhibit B).
6. Plaintiff has attached a Proposed Order that grants her motion to amend petition by interlineation, striking all references Ballpark Village Holdings, Block 600 LLC St. Louis: A Cowboy Bar and replacing them with SL Western Lounge, LLC. (See Proposed Order, Attached as Exhibit C).

Submitted this 25th Day of June, 2018.

Respectfully submitted,

OTT LAW FIRM



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CERTIFICATE OF SERVICE AND
CERTIFICATE OF COMPLIANCE WITH RULE 55.03(a)

The undersigned certifies that a true and correct copy of the foregoing was served by the Court's electronic filing system, this 25th day of May, 2018, on the counsel of record listed below. In addition, the undersigned counsel certifies under Rule 55.03(a) of the Missouri Rules of Civil Procedure that he has signed the original of this Certificate and the foregoing pleading.

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